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August 23, 2024

**VIA ECF**

Honorable Michael A. Hammer, U.S.M.J.  
United States District Court, District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Teva Branded Pharmaceutical Products R&D, Inc., et al. v. Cipla USA, Inc., et al.*, Civil Action No: 2:24-cv-00909 (SRC-MAH) (Consolidated)**

***Teva Branded Pharmaceutical Products R&D, Inc., et al. v. Cipla USA, Inc., et al.*, Civil Action No: 2:24-cv-05856 (SRC-MAH)**

***Teva Branded Pharmaceutical Products R&D, Inc., et al. v. Cipla USA, Inc., et al.*, Civil Action No: 2:24-cv-07162 (SRC-MAH)**

Dear Judge Hammer:

This firm, together with Williams & Connolly LLP, represents Plaintiffs Teva Branded Pharmaceutical Products R&D, Inc. and Norton (Waterford) Ltd. (collectively, "Teva") in connection with the above-referenced matters. On behalf of all parties, we write jointly to request a correction to the Pretrial Scheduling Orders (24-cv-909-SRC-MAH, D.E. 38; 24-cv-07162, D.E. 21; 24-cv-5856-SRC-MAH, D.E. 22), and to request an extension of the deadline to serve written discovery requests and the deadline by which the parties can bring discovery disputes to the Court's attention.

The Pretrial Scheduling Orders reflect the following deadlines for paragraph 9 and 10:

9. Plaintiff shall disclose its infringement contentions and responses to invalidity contentions, and commence production of the underlying documents, pursuant to L. Pat. R. 3.2 and 3.4A(e) by **January 8, 2025**.

10. The parties will exchange the proposed terms necessary for claims construction on or before **[completed]**.

It appears the Pretrial Scheduling Orders inadvertently omitted the date for Paragraph 10. The parties believe that Paragraph 9 of the Pretrial Scheduling Orders should state "December 20, 2024," and Paragraph 10 should state "January 8, 2025."

Moreover, under paragraph 3 of the Pretrial Scheduling Orders, the deadline for the parties to serve written discovery requests is on or before September 13, 2024. With the

requested extension, the new deadline to serve requests for production will be March 2, 2025, and the new deadline to serve interrogatories and requests for admission will be April 28, 2025.

Moreover, under paragraph 5 of the Pretrial Scheduling Orders, the deadline for the parties to bring discovery disputes to the Court's attention is March 3, 2025. With the requested extension, the new deadline for the parties to bring discovery disputes to the Court's attention will be June 13, 2025.

All other deadlines set in the Court's Pretrial Scheduling Orders will remain unchanged. Should the Court find the above request acceptable, the parties request that your Honor "So Order" this letter. As always, we thank the Court for its attention to this matter and are available should Your Honor or Your Honor's staff have any questions.

Respectfully submitted,

*s/ Liza M. Walsh*

Liza M. Walsh

cc: All counsel of record (via ECF and Email)

SO ORDERED this \_\_\_\_ day of \_\_\_\_, 2024.

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Honorable Michael A. Hammer, U.S.M.J.